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BY ELECTRONIC FILING

April 8, 2022

Honorable John P. Cronan
United States District Judge
U.S.D.C. Southern District of New York
500 Pearl Street
New York, NY 10007

Re: *Hasan A. Khan v. United States of America*
Civ. No. 21-CV-1757 (Cronan, J.) (Aaron, M.J.)

Dear Judge Cronan:

I represent the plaintiff Hasan Khan ("Mr. Khan") in the above-referenced case, which is currently in discovery. Pursuant to the Court's January 6, 2021 case management plan (Dkt. No. 35), fact discovery closed on December 17, 2021, expert discovery is set to close on May 4, 2022, and the parties have a joint status letter due on May 11, 2022. Per clause 7(d) of the plan, the parties extended by written consent to extend the expert disclosures from April 4, 2022 to April 20, 2022. Following from such, I write to respectfully request a 2-week extension of the expert discovery deadline in this matter, such that it will close on May 20, 2022. The reason for this request is that plaintiff is still treating and his experts need more time to finalize their reports.

This is the fifth request for an extension of the discovery deadlines in this case. The Court previously granted Plaintiff's request on July 9, 2021, the parties' joint request on October 6, 2021, Defendant's request on November 23, 2021, and the parties' joint request on January 5, 2022. Defendant's counsel consents to the requested extension. A revised proposed case management plan is attached to this letter.


Thank you for your consideration of this request.

Respectfully,

MICHAEL J. AVILES & ASSOCIATES
Attorneys for Plaintiff



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JOHN P. CRONAN
United States District Judge

SO ORDERED.
Date: April 11, 2022
New York, New York

cc: Defendant's Counsel (via ECF)